

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

2023 SEP 19 PM 3:1

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SEALED

4:23CR 3111

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KALI EMANNUEL WINN,

Defendant.

INDICTMENT

18 U.S.C. § 932(b)(1)
18 U.S.C. §§ 922(a)(6) and 924(a)(2)

The Grand Jury charges that:

COUNT ONE

On or about May 10, 2023, in the District of Nebraska, the defendant, KALI EMANNUEL WINN, did knowingly purchase three firearms, those being a Glock 42 .380 caliber pistol, a Ruger Security 380 .380 caliber pistol, and a Ruger LCP .380 caliber pistol, in or otherwise affecting interstate or foreign commerce for, on behalf of, and at the request of a Confidential Informant (CI), knowing and having reasonable cause to believe the CI had previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one year.

In violation of Title 18, United States Code, Section 932(b)(1).

COUNT TWO

On or about May 10, 2023, in the District of Nebraska, Defendant KALI EMANNUEL WINN, in connection with the acquisition of firearms, those being a Glock 42 .380 caliber pistol, a Ruger Security 380 .380 caliber pistol, and a Ruger LCP .380 caliber pistol, from Scheels in Lincoln, Nebraska, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Scheels, which statement was intended and likely to deceive Scheels as to a fact material to the lawfulness of

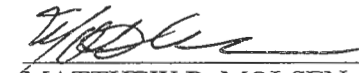
such attempted acquisition of said firearms to the defendant under chapter 44 of Title 18, in that Defendant KALI EMANNUEL WINN executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, and stated on the form that he was the actual buyer of the above described firearms, when in fact as Defendant KALI EMANNUEL WINN then knew, he was not the actual buyer of the firearms.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

A TRUE BILL.


FOREPERSON 

The United States of America requests that trial of this case be held in Lincoln, Nebraska, pursuant to the rules of this Court.



MATTHEW R. MOLSEN, #22693
Assistant U.S. Attorney